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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

April 25, 2024

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

MAXWELL SCHULTZ

§
§
§
§
§

CRIMINAL NO. 4:24-cr-00212

UNDER SEAL

INDICTMENT

THE GRAND JURY CHARGES:

At all times material to this Indictment:

GENERAL ALLEGATIONS

1. Waste Management, Incorporated (Waste Management), was a waste disposal company with offices throughout the United States, and was headquartered in Houston, Texas. In the course of operating their business, Waste Management used numerous computers, the vast majority of which were connected to the internet.

2. Defendant Maxwell Schultz was a contract employee for Waste Management who worked in their Information Technology (IT) department. Waste Management terminated the defendant's services with them on or about May 14, 2021.

COUNT ONE

(Fraud and Related Activity in Connection with Computers)

3. Between or about and between May 14, 2021, and on or about May 15, 2021, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

MAXWELL SCHULTZ,

did knowingly and intentionally cause and attempt to cause the transmission of one or more programs, information, codes and commands, and as a result of such conduct, did intentionally cause damage without authorization to one or more protected computers, to wit: one or more computers owned by Waste Management, which offense caused, and if completed would have caused, loss to one or more persons during a one-year period aggregating at least \$5,000 in value.

In violation of Title 18, United States Code, Sections 1030(a)(5)(A) and 2.

NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. §§ 982(a)(2)(B) & 1030(i))


4. Pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i), the United States gives notice that upon Defendant's conviction of the offense charged in Count One of this Indictment, the United States will seek forfeiture of (a) all property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offense; and (b) any personal property that was used or intended to be used to commit or to facilitate the commission of such offense.

5. The United States gives notice that it will seek a money judgment against the Defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the Defendant up to the amount of the money judgment.

A TRUE BILL

Original Signature on File
FOREPERSON OF THE GRAND JURY

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY


Rodolfo Ramirez
Assistant United States Attorney